therewith, which score may be zero;

- b) comparing each word in one of said blocks of text data to said listing to determine words in said first one of said blocks of text data which match one of said target words in said listing so as to determine matched text words and associated matched target words;
- c) determining a total score for said one of said blocks of text data based on said score associated with each matched target word;
- d) replacing said one of said blocks of text data with a substitute block of data if said total score for said one of said blocks of text data exceeds a predetermined numerical threshold;
- e) displaying said one of said blocks of text data or said substitute block of data;
- f) repeating steps a through e for each remaining block of text data in said page of data.

REMARKS

Claims 1-16 and 18-27 are pending. By this amendment, claims 1, 3-6, 8-13, 15-16 and 18-19 have been amended, claim 17 has been cancelled, and new claims 21-27 have been added.

In the Office Action of November 25, 1998, claims 1-4, 6-9 and 13-16 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Pat. No. 5,832,212, to Cragun et al. (hereinafter "Cragun"), claims 11-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No.

5,784,564, to Camaisa et al. (hereinafter "Camaisa"), and claims 5, 10, 17 and 19-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cragun. These rejections, at least insofar as applied to any claims currently in this application, are respectfully traversed for the reasons that follow.

Cragun discloses a filtering method and apparatus which includes selective replacement of objectionable words and display of a predefined message in response to an accumulated tally which exceeds a threshold, where the tally is based upon scores associated with categories of words or work fragments. Cragun discloses use of lists of words and word fragments for identifying the objectionable words.

Camaisa discloses a browser which filters web pages based on their uniform resource location codes (URLs). Camaisa generally discloses the use of both allow lists and deny lists for the URLs.

Independent claims 1, 6 and 13 of the present application were originally directed to replacement of words in a block of text data when the words matched target words in a listing.

Independent claims 1, 6 and 13 have now been amended to include limitations directed to determining a total score for the block of text data based on scores associated with the target words which match words in the block. These limitations were generally present in original claims 3, 8 and 15. Additionally, a limitation has been added to each of claims 1, 6 and 13 which

requires that at least one of the target words has a score which is negative. Applicant submits that the scores disclosed in Cragun are not associated with the target words, as claimed in claims 1, 6, and 13, but rather with the categories of target words (see col. 7, line 65 to col. 8, line 39, and FIGS. 8A and 8B). Additionally, it is clear that Cragun does not disclose the use of a negative score associated with at least one of the target words, as now claimed in claims 1, 6 and 13. Cragun only discloses increasing the tally and never decreasing (See e.g., col. 8, lines 50-52, col. 9, lines 7-8, and block 904 in FIG.9).

The use of a negative base score provides much greater accuracy and versatility to the filtering method. For example, a text block related to sexual harassment issues in the workplace which contains words such as "sexual" and "touching", this text block may well be heavily filtered if the Cragun method is used because these words (or the categories with which they are associated) may cause the accumulated tally to exceed the predetermined threshold. However, the use of negative scores in the method of the present invention allows the presence of the word "harassment" to reduce the score of the block such that it the block may not be filtered. Thus, the use of negative scores greatly improves the basic score based method by providing the flexibility to allow passage of blocks of text directed to such things as education or discussion regarding objectionable content. Because this limitation is not disclosed in the Cragun

patent or any other reference of record, applicant respectfully submits that independent claims 1, 6 and 13 are patentable.

Claims 2-5 are dependent upon independent claim 1, claims 7-10 are dependent upon independent claim 6 and claims 14-16 are dependent upon independent claim 13. In addition to being patentable because they are based upon patentable independent claims, these dependent claims are also patentable because they contain additional limitations which are patentable over the prior art. Claims 4, 5, 9, 10, and 16 contain limitations requiring that each target word has both a base score and a bonus score associated therewith, that at least one of the bonus scores is negative, and that the total score is determined based (at least in part) on the bonus scores. Cragun does not disclose any negative scores and, in fact, does not disclose two types of scores associated with the target words. Instead, Cragun discloses scores associated with particular categories and weight changes associated with the target ("censored") words (col. 8, lines 2-15 and FIG. 7). Additionally, claims 5, 10 and 16 contain particular limitations regarding scoring based on the proximity of words in the text block which match target words. As described below, Cragun does not disclose any such limitation.

Claims 18 has been amended to be based on independent claim 6 and applicant respectfully submits that claim 18 is now patentable over the prior art of record at least because claim 6 is now patentable. Claims 19 and 20 are ultimately dependent

upon claim 18 and, for at least the same reasons, applicant respectfully submits claims 19 and 20 are patentable.

Claims 11 and 12 are generally directed to a method including steps involving allow and deny lists and filtering of the header (claim 11) and the body of a web page (claim 12). These claims were rejected based upon a combination of Cragun and Camaisa and the Examiner stated that it would have been obvious to incorporate Cragun's browser censor in Camaisa's closed browser "because doing so would have improved effectiveness by ensuring the sites viewed do not contain objectionable material" and that the motivation for doing so would have been to provide content based filtering as well. Applicant respectfully traverses this rejection.

Respectfully, applicant submits that the Examiner's statement of "improved effectiveness" is not sufficient to support a rejection based on obviousness. The improved effectiveness is what is taught by the present application and such may not be used to provide the suggestion to combine the references. There is no suggestion in either Cragun or Camaisa to combine allow and deny lists with any sort of text filtering. In fact, Cragun devotes a large amount of text explaining in detail all the problems inherent in using allow/deny lists (col. 1, line 35 to col. 2, line 12) and, in fact, concludes by stating: "It is desirable to provide a censoring browser method and apparatus ... that is content based as opposed to address based." (emphasis

added) Thus, Cragun teaches away from a combination as claimed in claims 11 and 12.

Additionally, neither Cragun nor Camaisa discloses filtering the header of a web page, as claimed in independent claim 11. For these reasons, applicant respectfully submits that claims 11 and 12 are patentable over the prior art of record.

New dependent claims 21-24 have been added to more clearly specify the predetermined proximity limitations generally stated in the claims from which they depend.

New independent claims 25-27 have also been added. Claims 25 and 26 generally cover subject matter similar to claims 5 and 10 with at least one difference being that independent claims 25 and 26 do not require that any score be negative. Claim 27 is generally directed to a score-based filtering system with the limitation that in a web page comprising a plurality of blocks, a decision regarding displaying is made on each block individually. That is, each block is filtered and either displayed or a substitute block is displayed and then the next block is filtered.

The invention in claim 27 is patentable over Cragun because Cragun only discloses filtering the entire page before displaying (see, for example, column 3, lines 54-59: "...before any text is displayed ..."; also see FIG. 3, in which an entire selected or input location is filtered before displaying). Displaying certain blocks of text (or displaying a "FORBIDDEN" message for a

block) as they are filtered presents a much more precise filtering method. The user can then see the portions of the page which are non-objectionable and is only prevented from viewing the objectionable portions. Also, the user sees at least some portion of the page much more quickly. Thus, the user is much more likely to "submit" to this type of filtering.

The accuracy of a filtering method typically decreases as the size of the text block being filtered decreases because there is less text on which to base the filtering decision. Thus, the features of the present invention related to scoring based on proximity, etc. were developed to increase the accuracy of the filter when smaller blocks are filtered. These features improve the accuracy of the filtering method claimed in claim 27.

In view of the amendments and arguments above, it is respectfully submitted that the pending claims are now in condition for allowance. If any outstanding considerations remain, the Examiner is invited to contact the undersigned so that a swift resolution may be effected.

Favorable consideration is requested.

Respectfully submitted,

LARSON AND TAYLOR

Kevin R. Klein

Registration No. 38000

Date: May 25, 1999

LARSON & TAYLOR Transpotomac Plaza 1199 North Fairfax St, Suite 900 Alexandria, VA 22314

(703) 739-4900